

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JBS HAIR, INC.,

Plaintiff,

v.

SLI PRODUCTION CORP.,

Defendant.

CIVIL ACTION

NO. 2:22-01576- SRC-AME

JURY TRIAL DEMANDED

JBS HAIR, INC.,

Plaintiff,

v.

HAIR ZONE, INC.,

Defendant.

CIVIL ACTION

NO. 2:22-01577- SRC-AME

JURY TRIAL DEMANDED

JBS HAIR, INC.,

Plaintiff,

v.

BEAUTY ESSENCE, INC.,

Defendant.

CIVIL ACTION

NO. 2:22-01769- SRC-AME

JURY TRIAL DEMANDED

JOINT STIPULATION TO AMEND SCHEDULING ORDER

Plaintiff and Defendants, by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS on March 15, 2024, the Court entered a Revised Scheduling Order [Dkt.# 138] extending certain deadlines for fact and expert discovery;

WHEREAS on May 20, 2024, the parties filed two Joint Letters concerning deficiencies that Plaintiff claims remain in Defendants' discovery responses and document productions, which Plaintiff contends must be resolved before moving to expert discovery [Dkt#s 141 and 142];

WHEREAS the parties continue to meet and confer in an effort to resolve as many outstanding discovery issues as possible without the need for court intervention;

WHEREAS on May 3, 2024, the last day to complete fact discover in the three cases pending in this Court, the United States District Court for the Northern District of Georgia separately entered its claim construction order in the two related Georgia cases, triggering the deadlines in that court for the completion of fact and expert discovery, and the filing of summary judgment motions;

WHEREAS a number of the deadlines in the Georgia actions create inefficiencies and logistical challenges with the New Jersey cases, including having multiple expert reports on different issues due on the same day in the different sets of cases;

WHEREAS counsel for the parties have multiple conflicts with other matters and with professional and personal travel over the next few months;

WHEREAS the parties desire to align the schedules more closely in the New Jersey and Georgia lawsuits, and thereby to utilize the time and effort of their counsel and testifying experts more efficiently;

WHEREAS the parties are concurrently seeking adjustments to the Georgia scheduling orders to better coordinate the schedules in those cases with the requested schedules in these cases;

WHEREAS the timing of the Georgia court's claim construction ruling prevented the parties from seeking this modification of the scheduling order at least 10 days before the close of fact discovery here;

WHEREAS counsel for the parties have conferred, agree, and hereby certify that good cause for this further modification of the scheduling order exists;

WHEREAS the parties have agreed upon a proposed **FURTHER AMENDED SCHEDULING ORDER**, submitted herewith, and the parties respectfully request that the proposed order be entered as an order of this Court.

IT IS SO STIPULATED, by and through Counsel of Record.

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